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Attorneys for Defendant Cisco Systems, Inc.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

EON CORP. IP HOLDINGS, LLC,

Plaintiff,

vs.

SENSUS USA INC., et. al.,

Defendants.

Case No.: 3:12-CV-01011-JST

**CISCO SYSTEMS, INC.'S
ADMINISTRATIVE MOTION TO FILE
DOCUMENTS UNDER SEAL**

1 Pursuant to Civil Local Rule 7-11, Civil Local Rule 79-5, and this Court's Standing Order
2 Governing Administrative Motions to File Materials Under Seal, Defendant Cisco Systems, Inc.
3 ("Cisco") files this Administrative Motion to File Documents Under Seal (the "Motion to Seal")
4 and respectfully requests that the Court enter an order sealing Exhibit A of the Declaration of L.
5 Norwood Jameson in support of Defendants' Motion for Attorneys' Fees and Sanctions (the
6 "Motion for Fees").
7

8 Cisco has reviewed and complied with Civil Local Rule 7-11, Civil Local Rule 79-5, this
9 Court's Standing Order Governing Administrative Motions to File Materials Under Seal, and the
10 instructions for e-filing under seal provided on the Court's website at
11 <http://cand.uscourts.gov/ecf/underseal>. *See* Haddock Decl. ¶ 3.
12

13 Exhibit A of the Declaration of L. Norwood Jameson in support of the Motion for Fees is a
14 spreadsheet with a detailed description of the work performed by Duane Morris attorneys and
15 paralegals for the time period of August 1, 2013 through April 30, 2014. *See* Haddock Decl. ¶ 4.
16 In some instances, the descriptions in the spreadsheet have been revised from what appears on
17 actual invoices to protect against the disclosure of attorney-client information, attorney work
18 product, or other highly sensitive litigation strategies, but the spreadsheet still summarizes the
19 nature of the work and the date of the work so the Court can evaluate the reasonableness of the
20 work performed. *See* Haddock Decl. ¶ 5. The spreadsheet contains non-public, sensitive
21 information about Cisco's litigation tactics and strategies. Cisco stands to suffer great harm and
22 would be placed in a vulnerable position should this information become public. *See* Haddock
23 Decl. ¶ 6.
24

25 Because Exhibit A offers support for a non-dispositive motion, Cisco has shown good
26 cause for a request that is narrowly tailored to only one exhibit. *See* Haddock Decl. ¶ 7. As such,
27 Cisco respectfully requests that the Court grant the Motion to Seal.
28

Respectfully submitted this 28th day of May, 2014.

/s/Alison M. Haddock

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Attorneys for Defendant Cisco Systems, Inc.

CERTIFICATION PURSUANT TO L.R. 5-1(i)(3)

Pursuant to Local Rule 5-1(i)(3), I hereby certify that I have obtained the concurrence in the filing of this document from all the signatories for whom a signature is indicated by a “conformed” signature (/s/) within this e-filed document and I have on file records to support this concurrence for subsequent production for the Court if so ordered or for inspection upon request.

Executed on May 28, 2014, in Atlanta, Georgia.

/s/Alison M. Haddock

Alison M. Haddock